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17 **UNITED STATES DISTRICT COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19 **SAN FRANCISCO DIVISION**

20 AMERICAN FEDERATION OF  
21 GOVERNMENT EMPLOYEES, AFL-CIO, et  
al.,

22 Plaintiffs,

23 v.

24 DONALD J. TRUMP, in his official capacity as  
25 President of the United States, et al.,

26 Defendants.  
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Case No.: 3:25-cv-03070-JD

**DECLARATION OF EDWARD  
ABOUNADER**

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I, Edward Abounader, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am a Management Analyst for the Defense Finance and Accounting Service (“DFAS” or “Union”) in the Department of Defense (DOD). I have worked for DFAS for 28 years, since 1997. In my role, I reconcile various program accounts, analyze data, and provide support in planning budgets for programs across the DOD. My office essentially operates as the accounting arm of the DOD.

3. I am the President of the American Federation of Government Employees (“AFGE”) Council 171. I have been the President of the Council for 18 years. I was also the President of AFGE Local 201, one of the locals affiliated with Council 171, for 23 years.

4. Council 171 represents a bargaining unit of approximately 8,000 civil servants who work for DFAS in approximately six sites across the country – Cleveland, OH, Columbus, OH, Indianapolis, IN, Rome, NY, Limestone, ME, and Washington, DC. Of these workers, Council 171 represents about 2,600 members. These employees include accountants, accounting technicians, data analysts, administrative assistants, financial planners, and payroll, logistical, and call center service employees. These bargaining unit members act as the accounting arm of the DOD and strictly provide financial services for the various departments within the Agency. On its face, the March 27, 2025, Executive Order titled “Exclusions from Federal Labor Management Relations Programs” (“Executive Order”) appears to cover all of the workers in Council 171.

5. Council 171’s mission is to advocate for and promote the interests of bargaining unit members in their federal employment, including working for a safe and fair workplace for all members. As the exclusive bargaining representative of these workers, the Union provides many services to all bargaining unit members. Core functions of the Union include collective bargaining with the agency to obtain and maintain a fair and reasonable collective bargaining

1 agreement (“CBA”); filing and negotiating grievances against the agency to enforce the terms  
2 and conditions of the CBA; pursuing arbitrations on behalf of workers to enforce the CBA; and  
3 providing other support, guidance, and resources to bargaining unit employees.

4 6. The Executive Order will have an immediate adverse effect on the Union’s ability  
5 to provide these services to unit members and to accomplish its mission. The Executive Order  
6 will also have an immediate adverse impact on workers in the bargaining unit.

7 7. If the Union is no longer the exclusive bargaining representative of the unit, the  
8 Union cannot enforce the CBA against the agency. The CBA, which is effective from October  
9 31, 2023, to October 31, 2026, provides important rights and protections to workers. For  
10 instance, the CBA:

- 11 a. Sets terms and conditions for working hours, overtime, sick leave, holidays, and  
12 paid time off for workers in the unit.
- 13 b. Imposes safety and health requirements to ensure the welfare of workers in their  
14 place of employment.
- 15 c. Establishes protections for workers regarding reduction-in-force (“RIF”) actions  
16 and procedures.
- 17 d. Imposes procedures for and limitations on disciplinary and adverse actions against  
18 workers.
- 19 e. Provides for an Employee Assistance Program for individuals who have problems  
20 associated with alcohol, drug, marital, family, legal, financial, stress, attendance,  
21 and other personal concerns.
- 22 f. Establishes grievance and arbitration procedures for employees and the Union to  
23 resolve disputes with the agency over employment matters.
- 24 g. Provides for official time, which allows bargaining unit employees to perform  
25 union representation activities during certain amounts of time the employee  
26 otherwise would be in a duty status, without loss of pay or charge to annual leave,  
27 and on agency property.

1 Without the Union to represent them and enforce the CBA, the workers will not have the  
2 benefit of those rights and protections going forward. I understand that the agency is also likely  
3 to rescind the CBA under the Executive Order.

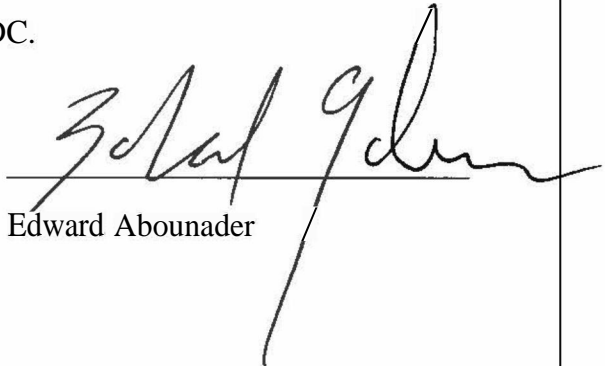
4 8. The Union's staff and activities are funded through members' voluntary dues. If  
5 the Union can no longer receive dues under the Executive Order, the Union will not be able to  
6 continue to function or provide any of its services or protection to the members listed above.

7 9. Official time is critical to enable the Union to represent workers. Union  
8 representatives need to be able to interact with management and employees during the workday.  
9 If official time is removed, it will be very difficult for the Union to effectively represent  
10 bargaining unit members effectively.

11 10. The Executive Order is chilling workers' speech and activity. I know firsthand  
12 that without the protections of the CBA and the Union, workers will be afraid to raise concerns  
13 over workplace conditions with the agency. Additionally, because this Executive Order targets  
14 federal unions and their employees, many of my Union and DFAS colleagues are reluctant to  
15 criticize the administration for fear of further retaliation. I believe that the Executive Order is  
16 retaliation against AFGE and its members.

17 I declare under penalty of perjury under the laws of the United States that the foregoing is  
18 true and correct. Executed April 1, 2025, in Washington, DC.

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Edward Abounader